

1 I. NEEL CHATTERJEE (STATE BAR NO. 173985)
nchatterjee@orrick.com
2 MONTE M.F. COOPER (STATE BAR NO. 196746)
mcooper@orrick.com
3 THERESA A. SUTTON (STATE BAR NO. 211857)
tsutton@orrick.com
4 MORVARID METANAT (STATE BAR NO. 268228)
mmetanat@orrick.com
5 ORRICK, HERRINGTON & SUTCLIFFE LLP
1000 Marsh Road
6 Menlo Park, CA 94025
Telephone: 650-614-7400
7 Facsimile: 650-614-7401
8 Attorneys for Plaintiff
FACEBOOK, INC.
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

FACEBOOK, INC.,

Plaintiffs,

v.

POWER VENTURES, INC. a Cayman Island
Corporation.; STEVE VACHANI, an
individual; DOE 1, d/b/a POWER.COM,
DOES 2-25, inclusive,

Defendants.

Case No. 5:08-cv-05780 JW

**ADMINISTRATIVE MOTION FOR
SEALING ORDER PURSUANT TO
CIVIL L.R. 79-5(D) IN CONNECTION
WITH ERRATA NO. 2 RE
DECLARATION OF LAWRENCE
MELLING IN SUPPORT OF
FACEBOOK'S MOTION FOR
PARTIAL SUMMARY JUDGMENT
ON COUNT 1**

Dept: Courtroom 9, 19th Floor
Judge: Honorable James Ware

1 Pursuant to Local Rules 7-11 and 79-5(d), Plaintiff Facebook, Inc. submits this
2 Administrative Motion for sealing order regarding Errata No. 2 Re Declaration of Lawrence
3 Melling in Support of Plaintiff Facebook Inc.'s Motion for Partial Summary Judgment on Count
4 1. Facebook's Errata, including its exhibits, contains excerpts from materials that Defendants
5 Power Ventures, Inc., and Steve Vachani have designated as "Highly Confidential-Attorneys'
6 Eyes Only" pursuant to the parties' Protective Order (Dkt. No. 95). Facebook takes no position
7 with respect to Defendants' confidentiality designations and hereby lodges with the Clerk,
8 pursuant to Civil L.R. 79-5(d), an unredacted copy of Errata No. 2 Re Declaration of Lawrence
9 Melling in Support of Facebook's Motion for Partial Summary Judgment on Count 1 of the CAN-
10 SPAM Act, pending this Court's decision following the filing of Defendants' Declaration
11 (demonstrating good cause to seal these materials from the public record) and narrowly tailored
12 proposed sealing order. Civil L.R. 79-5(d).

13

14

Dated: November 29, 2011

ORRICK, HERRINGTON & SUTCLIFFE LLP

15

16

/s/ Morvarid Metanat /s/

MORVARID METANAT

Attorneys for Plaintiff
FACEBOOK, INC.

17

18

19

20

21

22

23

24

25

26

27

28